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B-94-364

October 18, 2001

The Honorable Walter E. Black, Jr.
Senior United States District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

RE: *Grandison v. Lanham, et al.*, Civil No. B-94-204; *Siler v. Simms, et al.*, Civil No. B-98-3142

Dear Judge Black:

The parties have not been able to complete sufficient discovery to go to trial in the referenced cases. Therefore, please allow this letter to serve as the parties' joint request for an extension of the discovery deadline, which is now October 31, 2001. We both believe that we will be able to complete all discovery by the end of the year. Counsel therefore ask the Court to enter an Amended Scheduling Order in each of the referenced cases, providing for a discovery deadline of December 31, 2001, dispositive pretrial motions by January 31, 2002, responses by February 28, 2002, and replies thereto in accordance with the Local Rules.

Ms. Lane-Weber and I have agreed to the deposition of Plaintiff Grandison on November 13, 2001, at 10:00 a.m., at the Maryland Correctional Adjustment Center. I am enclosing a proposed order for the Court's review that allows the deposition to take place.

Both Ms. Lane-Weber and I regret the need to yet again seek an extension of the time for discovery. We apologize for any inconvenience to the Court.

APPROVED this 21st day
of October, 2001.

Walter E. Black
Walter E. Black,
Senior Judge

October 18, 2001
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Ms. Lane-Weber has reviewed this letter and concurs in its filing. We both thank the Court for its time and consideration of these matters.

Respectfully submitted,



Joseph B. Tetrault
Staff Attorney
Counsel for Messrs. Grandison & Siler

cc: Stephanie Lane-Weber, Assistant Attorney General